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November 21, 2003

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The Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
Attention: Dockets and Records Manager
Sharla Dillon

Re: *Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Switching)*
Docket No. 03-00491

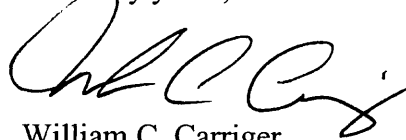
Dear Chairman Tate:

We are enclosing an original of the Electric Power Board of Chattanooga's Response to BellSouth Telecommunications, Inc.'s First Set of Interrogatories together with thirteen copies.

Also, enclosed are an original of the Electric Power Board of Chattanooga's Response to BellSouth Telecommunication, Inc.'s First Request for Production of Documents together with 13 copies.

An additional copy of each pleading is enclosed, which we request be stamped filed and returned to us.

Sincerely yours,



William C. Carriger
For the Firm

WCC:tm

EPB/TEL - #229

Enclosures

cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

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T.R.A. DOCKET ROOM

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Switching)*

Docket No. 03-00491

ELECTRIC POWER BOARD OF CHATTANOOGA'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS

On November 6, 2003, the Electric Power Board of Chattanooga ("EPB") filed its Preliminary Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents ("Objections"). All responses below are made without waiving and are subject to EPB's Objections.

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

RESPONSE: Any documents identified will be submitted with the Responses to Interrogatories.

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.

RESPONSE: See EPB's Objections.

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide qualifying service.

RESPONSE: See EPB's Objections.

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you only provide qualifying service.

RESPONSE: See EPB's Objections.

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

RESPONSE: See EPB's Objections.

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

RESPONSE: See EPB's Objections.

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

RESPONSE: See EPB's Objections.

8. Provide all documents referring or relating to the classifications used by EPB to offer service to end user customers Tennessee (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

RESPONSE: See EPB's Objections.

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by EPB, as requested in BellSouth's First Set of Interrogatories, No. 34.

RESPONSE: See EPB's Objections.

10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by EPB, as requested in BellSouth's First Set of Interrogatories, No. 35.

RESPONSE: See EPB's Objections.

11. Produce all documents referring or relating to how EPB determines whether to serve an individual customer's location with multiple DSOs or with a DS1 or larger transmission system.

RESPONSE: See EPB's Objections.

12. Produce all documents referring or relating to the typical or average number of DSOs at which EPB would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DSO, all other things being equal.

RESPONSE: See EPB's Objections.

13. Produce all documents referring or relating to the cost of capital used by EPB in evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE: EPB has not made any evaluation of offering service in another geographic market.

14. Produce all documents referring or relating to the time period used by EPB in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

RESPONSE: See Response to 13.

15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE: See Response to 13.

16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

RESPONSE: See Response to 13.

17. Produce all documents referring or relating to any complaints by EPB or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

RESPONSE: See EPB's Objections.

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to EPB or that EPB believes is superior to BellSouth's batch hot cut process.

RESPONSE: See EPB's Objections.

19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to

EPB or that EPB believes is superior to BellSouth's individual hot cut process.

RESPONSE: See EPB's Objections.

20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to EPB or that EPB believes is superior to BellSouth's batch hot cut process.

RESPONSE: See EPB's Objections.

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to EPB or that EPB believes is superior to BellSouth's individual hot cut process.

RESPONSE: See EPB's Objections.

Respectfully submitted,

STRANG, FLETCHER, CARRIGER,
WALKER, HODGE & SMITH, PLLC

By:



Carlos C. Smith (BPR #1710)

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2003, the foregoing document was served on the parties of record, via the method indicated:

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<input type="checkbox"/>	Hand	Martha M. Ross-Bain, Esquire
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<input type="checkbox"/>	Overnight	Atlanta, GA 30309
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